

**IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF INDIANA  
INDIANAPOLIS DIVISION**

**FINISHMASTER, INC.,**  
**Plaintiff,**

**vs.**

**Case No. 1:20-cv-299**

**GMP CARS, LLC; GMP CARS COLLISION  
FREMONT, LLC; GMP CARS COLLISION  
SAN FRANCISCO, LLC, GMP CARS  
COLLISION SAN RAFAEL, LLC; GMP  
CARS COLLISION SANTA CLARA, LLC;  
GMP CARS COLLISION FAIRFIELD, LLC;  
GMP CARS COLLISION SANTA ROSA,  
LLC; GMP CARS COLLISION VALLEJO,  
LLC; and GEOFFREY PALERMO,  
Defendants.**

**DEFENDANTS' SUPPLEMENTAL JURISDICTIONAL STATEMENT**

Defendants, GMP Cars, LLC; GMP Cars Collision Fremont, LLC; GMP Cars Collision San Francisco, LLC; GMP Cars Collision San Rafael, LLC; GMP Cars Collision Santa Clara, LLC; GMP Cars Collision Fairfield, LLC; GMP Cars Collision Santa Rosa, LLC; GMP Cars Collision Vallejo, LLC; and Geoffrey Palermo (collectively, "Defendants"), by counsel, at the direction of this Court's Order to Show Cause, dated February 3, 2020, hereby submit their Supplemental Jurisdictional Statement in support of their January 27, 2020 Notice of Removal, and state as follows:

1. Defendant, GMP Cars, LLC, is a California limited liability company. The sole member of Defendant, GMP Cars, LLC, is Defendant, Geoffrey Palermo, a resident and citizen of the State of California, whose address is 162 Del Oro Lagoon, Novato, CA 94949.
2. Defendant, GMP Cars Collision Fremont, LLC, is a California limited liability company. The sole member of Defendant, GMP Cars Collision Fremont, LLC, is Defendant,

Geoffrey Palermo, a resident and citizen of the State of California, whose address is 162 Del Oro Lagoon, Novato, CA 94949.

3. Defendant, GMP Cars Collision San Francisco, LLC, is a California limited liability company. The sole member of Defendant, GMP Cars Collision San Francisco, LLC, is Defendant, Geoffrey Palermo, a resident and citizen of the State of California, whose address is 162 Del Oro Lagoon, Novato, CA 94949.

4. Defendant, GMP Cars Collision San Rafael, LLC, is a California limited liability company. The sole member of Defendant, GMP Cars Collision San Rafael, LLC, is Defendant, Geoffrey Palermo, a resident and citizen of the State of California, whose address is 162 Del Oro Lagoon, Novato, CA 94949.

5. Defendant, GMP Cars Collision Santa Clara, LLC, is a California limited liability company. The sole member of Defendant, GMP Cars Collision Santa Clara, LLC, is Defendant, Geoffrey Palermo, a resident and citizen of the State of California, whose address is 162 Del Oro Lagoon, Novato, CA 94949.

6. Defendant, GMP Cars Collision Fairfield, LLC, is a California limited liability company. The sole member of Defendant, GMP Cars Collision Fairfield, LLC, is Defendant, Geoffrey Palermo, a resident and citizen of the State of California, whose address is 162 Del Oro Lagoon, Novato, CA 94949.

7. Defendant, GMP Cars Collision Santa Rosa, LLC, is a California limited liability company. The sole member of Defendant, GMP Cars Collision Santa Rosa, LLC, is Defendant, Geoffrey Palermo, a resident and citizen of the State of California, whose address is 162 Del Oro Lagoon, Novato, CA 94949.

8. Defendant, GMP Cars Collision Vallejo, LLC, is a California limited liability company. The sole member of Defendant, GMP Cars, LLC, is Defendant, Geoffrey Palermo, a

resident and citizen of the State of California, whose address is 162 Del Oro Lagoon, Novato, CA 94949.

9. At no time was any Defendant organized under the laws of the State of Indiana or a resident of the State of Indiana. Nor did any Defendant maintain a place of business in the State of Indiana.

10. In light of the foregoing, complete diversity of citizenship exists as between Plaintiff, an Indiana corporation, and Defendant, Geoffrey Palermo, a resident and citizen of the State of California and the sole member of each of the limited liability company Defendants.

WHEREFORE, Defendants, GMP Cars, LLC; GMP Cars Collision Fremont, LLC; GMP Cars Collision San Francisco, LLC; GMP Cars Collision San Rafael, LLC; GMP Cars Collision Santa Clara, LLC; GMP Cars Collision Fairfield, LLC; GMP Cars Collision Santa Rosa, LLC; GMP Cars Collision Vallejo, LLC; and Geoffrey Palermo, respectfully request that this Court find that this Supplemental Jurisdictional Statement establishes this Court's diversity jurisdiction over this case pursuant to 28 U.S.C. 1441 *et seq.* and for all other proper relief.

*/s/ William M. Braman*

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Attorney for Defendants

**CERTIFICATE OF SERVICE**

I hereby certify that the above and foregoing Supplemental Jurisdictional Statement was E-filed via the Court's e-file system and served on the following counsel of record, at their email addresses of record, on this 6<sup>th</sup> day of February, 2020, Matthew B. Barr and Kelsey C. Dilday, counsel for Plaintiff.

*/s/ William M. Braman*

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William M. Braman